



**Terry Tamminen**  
*Secretary for  
Environmental  
Protection*

# **State Water Resources Control Board**

## **Division of Financial Assistance**

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**Arnold Schwarzenegger**  
*Governor*

**JAN - 7 2004**

Mr. Kamyar Guivetchi, P. E.  
Manager, Statewide Planning Branch  
Department of Water Resources  
P. O. Box 942836  
Sacramento, CA 94236-0001

Dear Mr. Guivetchi:

STATE WATER RESOURCES CONTROL BOARD (SWRCB), DIVISION OF FINANCIAL ASSISTANCE (DIVISION); REVIEW COMMENTS ON THE DEPARTMENT OF WATER RESOURCES (DWR) CALIFORNIA WATER PLAN UPDATE 2003 – STAKEHOLDER BRIEFING DRAFT

Thank you for providing Division staff an overview of the California Water Plan Update 2003 (Water Plan) on November 5, 2003. We commend you and your staff on the good work done so far on this vital topic, and want to take this opportunity to provide you our comments.

1. The draft Water Plan provides recommendations involving funding programs, and among those recommendations are ones for preferences. There are at least 15 recommendations for different preferences for funding programs. The bond acts providing the funding also contain preferences. The legislation appropriating the local assistance to agencies as well as trailer bills and other legislation also establish preferences. With the preferences listed in the draft Water Plan added to those already established in laws, funding programs would face a myriad of preferences, some overlapping and some even conflicting. The draft Water Plan should address how agencies would deal with all these preferences when implementing funding programs. How would they decide which preferences were more important than others? Are there some preferences that are prerequisites to funding? How would funding agencies decide between competing or conflicting preferences? Should some preferences be translated into criteria or be expressed in the weighing of criteria and if so, how does one identify which ones? Should some preferences be implemented in other manners, outreach for example, and if so what mechanisms should be used and how does one identify which preferences should be so identified?
2. The draft Water Plan provides recommendations involving funding programs and how they may be used to achieve its goals. There may be legal constraints on the existing sources of funding that conflict with some of the recommendations. Additionally, many of these recommendations will require significant staff resources. The draft Water Plan needs to analyze these recommendations to identify those that may be in conflict with the legal constraints of the existing funding sources, and where a constraint is identified discuss options and recommend actions to resolve those constraints. The Water Plan also needs to

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address the factors that will impact the availability of staff resources to implement funding programs in the near term and possibly in the longer term. The funds available for administration of the bond acts are limited, usually to five percent of the total made available.

There are a growing number of requirements for the implementation of the bond act funding programs. There are requirements in the bond acts, and in legislation. Where the Water Plan makes recommendations for the use of funding programs, it should discuss the impact of those recommendations on staff resources and options for providing staff resources from other than from the administration allowance.

3. The funds provided for local projects from bond acts to the SWRCB are in support of the water quality portion of our mission, i.e., preserve, enhance, and restore the quality of California's water resources. There is a limited amount of funding available to address water quality problems. Those funds need to be targeted to solve the biggest water quality problems. The draft Water Plan makes recommendations for the use of funding programs to address problems related to water quality. The Water Plan needs to acknowledge the priorities established in the SWRCB's Strategic Plan and the Regional Water Quality Control Board Watershed Management Initiative (WMI) Chapters for addressing water quality problems. Specifically, when the Water Plan makes a recommendation regarding funding to address a water quality problem it should identify its priority in the Strategic Plan and/or WMI Chapter and address why it should be considered high priority.
4. Chapter Four addresses Regional Integrated Resource Planning. Chapter Eight of Proposition 50 provides funds for Integrated Regional Water Management. Both chapters lack definitions of what a (integrated) regional agency is and what it does, and what a regional integrated or integrated regional plan contains. Operational definitions are needed as a basis for the Water Plan as well as the distribution of the funds from Chapter 8 of Proposition 50. As a statewide planning document the Water Plan should address these issues. Additionally, in addressing these questions the Water Plan needs to ensure that aspects other than supply, such as water quality, of integrated water planning are included.
5. A second issue that the Water Plan should address regarding integrated regional planning is a common or universal method of measuring performance and effectiveness. Plans will be created, and suites of projects will be funded and constructed using them as a basis. How do we compare the effectiveness and performance of these regional plans, regional agencies and/or suites of integrated regional projects? The Water Plan should define what effectiveness and performance means for a regional agency, an integrated regional plan, and the projects included in the plan and agency jurisdiction. It should then proceed to develop example sets of performance and effectiveness measures based on actual integrated regional plans.



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Thank you again for the opportunity to comment on the Plan. We look forward to reviewing future drafts of the Plan. If you have any questions regarding our comments, please contact Mr. Wayne Pierson, Assistant Division Chief, at (916) 341-5755 or [piersonw@swrcb.ca.gov](mailto:piersonw@swrcb.ca.gov).

Sincerely,



Barbara L. Evoy, Chief  
Division of Financial Assistance

Enclosure

cc: Mr. Paul Dabbs  
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Department of Water Resources

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